

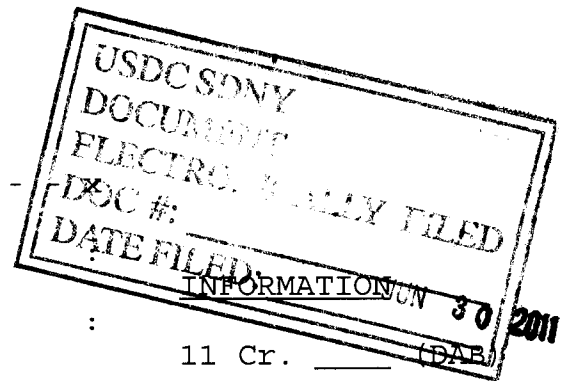
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CATARINA PIETRA TOUMEI,  
a/k/a "Lady Catarina Pietra Toumei,"

Defendant.



11 Cr. \_\_\_\_\_

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COUNT ONE

(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about May 2010, up to and including in or about December 2010, in the Southern District of New York and elsewhere, CATARINA PIETRA TOUMEI, a/k/a "Lady Catarina Pietra Toumei," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit wire fraud in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that CATARINA PIETRA TOUMEI, a/k/a "Lady Catarina Pietra Toumei," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and

**JUDGE BATTS**

radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Overt Act

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 10, 2010, CATARINA PIETRA TOUMEI, a/k/a "Lady Catarina Pietra Toumei," the defendant, sent an e-mail to an intended victim of the scheme to defraud, which attached a letter on stationary bearing the header "Guggenheim Fund, New York, New York, USA," and which sought to enter into a business relationship with former Presidents George H.W. Bush and George W. Bush.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As a result of committing the wire fraud offense in violation of Title 18, United States Code, Section 1349 alleged in Count One of this Information, CATARINA PIETRA TOUMEI, a/k/a "Lady Catarina Pietra Toumei," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from,

proceeds obtained, directly or indirectly, as a result of the offense alleged in Count One of this Information.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of

CATARINA PIETRA TOUMEI, a/k/a "Lady Catarina Pietra Toumei," the defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853.)

  
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PREET BHARARA JK  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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a/k/a "Lady Catarina Pietra Toumei,"

Defendant.

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INFORMATION

11 Cr. \_\_\_\_ (DAB)

(18 U.S.C. § 1349.)

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PREET BHARARA  
United States Attorney.

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6/30/11  
Bst

Waiver of trial filed + info filed  
Arraignments

M. J. Souter